

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 1:24-CR-20188-RAR-5

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS VELEZ,

Defendant.

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**UNOPPOSED MOTION FOR PERMISSION TO TRAVEL**

COMES NOW, the Defendant, CARLOS VELEZ, who, by and through the undersigned counsel, moves this Honorable Court to Modify his Conditions of Release to Allow for Temporary Travel, and, as grounds thereof, states as follows:

1. The Defendant is scheduled to surrender on Tuesday, November 4, 2025.
2. The Defendant would like to see his mother, Martha Collins, prior to his surrender.
3. The Defendant's mother is a resident of New York and the Defendant would be staying at 675 Seabury Avenue, Franklin Square, New York 11010 for the entire duration of the travel.
4. The Defendant's children will be staying with his mother in New York and the Defendant needs to register them in school.
5. The Defendant would drive in order to travel to New York and to return to the Southern District of Florida.

6. The proposed dates of travel are Friday, August 22, 2025, to Sunday, November 2, 2025.
7. US Probation Officer Mackenzie Hilaire has been advised of this request and has no objection.
8. AUSA Katherine Guthrie has been advised of this request and has no objection.

WHEREFORE, the Defendant respectfully prays that this Honorable Court grant this Motion for Permission to Travel to attend to familial affairs prior to his surrender.

Respectfully submitted,  
SAAM ZANGENEH, P.A.  
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/s/ **Saam Zangeneh**

By: Saam Zangeneh, Esq.  
Fla. Bar No.: 526721

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Unopposed Motion for Permission to Travel has been electronically filed this 19th day of August, 2025.

/s/ **Saam Zangeneh**

By: Saam Zangeneh, Esq.